

VINCENT A. BONGIORNI
ATTORNEY AT LAW
95 STATE STREET
SPRINGFIELD, MASSACHUSETTS 01103-2000
—
(413) 732-0222
FAX (413) 746-4971

FILED
APR 25 2005
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

April 22, 2005

U.S. Department of Justice
Attention: Ariane Vuono, Asst. US Atty.
Federal Building and Courthouse
Main Street - Room 310
Springfield, MA 01103

RE: United States v. Anthony Arillota
Criminal No. 05-30001-MAP

Dear Attorney Vuono,


This letter is being sent to you pursuant to Local Rules 116.3.

I am in receipt of your letter dated April 7, 2005 and would request I be provided with the following materials described in your letter: copies of the State search warrant described in paragraph B.(1), copies of monitoring logs, preliminary transcripts and tape recording made pursuant to Judge Ponsor 's March 24, 2003 Order #MBD No. 03-30016 MAP.

Although I note the Government declines to provide the electronic surveillance material because it does not intend to use them in its case in chief, Rule 16 (B) provides these materials be made available upon defendant's request and is not made dependant upon the government's intended use. Local Rule 116.1 (C)(1)(c) covers the response made at paragraph (C) of your letter but 116.1 (C)(1)(a) requires all Rule 16 materials be provided.

I would also ask for disclosure of written Summaries of Expert Witnesses the Government intends to call at trial.

Very truly yours,



Vincent A. Bongiorno

VAB/mla